

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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EPIC SYSTEMS CORPORATION  
1979 Milky Way,  
Verona, WI 53593,

Plaintiff,

v.

Case No. 13-cv-355

NEIL SILVER,  
3959 St. Denis,  
Suite 401  
Montreal, Quebec H2W2M4  
Canada

Defendant,

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**MOTION TO SEAL COMPLAINT**

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Plaintiff, Epic Systems Corporation (“Epic”), by its attorneys, Quarles & Brady LLP, moves to seal its Complaint against the Defendant. Epic’s Complaint details a scheme by which Defendant has made unauthorized use of Epic’s proprietary information about Epic’s software. Epic does not want to publicize the methods used by Defendant to use its information that are referenced in the Complaint. Accordingly, out of an abundance of caution, Epic moves the Court to file the Complaint under seal. Epic further moves that the Court order Defendant to maintain the Complaint in confidence and not disclose it to third parties except attorneys he may retain to defend him in this action.

Dated this 30th day of May, 2013.

QUARLES & BRADY LLP

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